

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**In re:** ) **Chapter 11**  
                  )  
**W. R. GRACE & CO., et al.** ) **Case No. 01-01139 (JKF)**  
                  )  
**Debtors.**       ) **(Jointly Administered)**

**NOTICE OF INTENTION TO TAKE DEPOSITION OF  
DR. JAMES MILLETTE, PH.D.**

**To: ASBESTOS PROPERTY DAMAGE CLAIMANTS AND THEIR ATTORNEYS:**

PLEASE TAKE NOTICE that the Debtors will take the deposition upon oral examination of James Millettte, Ph.D, before a person authorized to administer oaths, at the offices of Ogletree Deakins, 600 Peachtree Street, N.E., Suite 2100, Atlanta, Georgia 30308, on Tuesday, March 27, 2007, commencing at 9:00 AM and continuing from day to day until complete. Dr. Millette will answer such questions as are propounded to him regarding his expert report(s) that were filed pursuant to the Amended Order Setting Various Deadlines Regarding Objections to Asbestos Property Damage Claims (dated October 13, 2006), scheduling a hearing before Judge Judith K. Fitzgerald on May 30 – 31, 2007, on the lack of hazard issues as described in the 15<sup>th</sup> Omnibus Objections, and related issues. The deposition will be stenographically recorded.

The witness is requested to bring with him and produce any and all documents, writings, data and any other information as referred to in the attached list, Exhibit A.

Counsel is hereby invited to appear and take such part in the examination as may be proper.

Dated: March 7, 2007

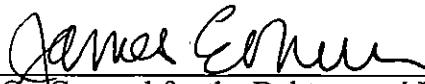
REED SMITH LLP  
James J. Restivo, Jr., Esq. (#10113)  
Lawrence Flatley, Esq. (#21871)  
Douglas E. Cameron, Esq. (#41644)  
Traci S. Rea, Esq. (#76258)  
435 Sixth Avenue  
Pittsburgh, PA 15219  
Telephone: (412) 288-3131  
Facsimile: (412) 288-3063

KIRKLAND & ELLIS LLP  
David M. Bernick, P.C.  
Janet S. Baer  
Salvatore F. Bianca  
200 East Randolph Drive  
Chicago, Illinois 60601  
Telephone: (312) 861-2000  
Facsimile: (312) 861-2200

And

PACHULSKI STANG ZIEHL YOUNG JONES  
& WEINTRAUB LLP  
Laura Davis Jones (Bar No. 2436)  
James E. O'Neill (Bar No. 4042)  
919 North Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, Delaware 19899-8705  
(Courier 19801)  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400

By:

  
\_\_\_\_\_  
Co-Counsel for the Debtors and Debtors in  
Possession

**Exhibit A**

1. A current CV.
2. A copy of all materials you considered or relied upon in drafting your expert report(s) submitted with respect to the lack of hazard issues ("Expert Report(s)").
3. Copies of any and all notes that exist concerning the substance or topic of your Expert Report(s).
4. Any and all communications between you and any other expert retained or consulted by the Asbestos Property Damage Committee in connection with the Adjudication of Lack of Hazard issues as described in the 15<sup>th</sup> Omnibus Objections.